

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA

Plaintiff,

v.

**COMMONWEALTH OF PUERTO RICO,
et. al.**

Defendants.

CIVIL NO. 12-2039 (GAG)(PG)

**JOINT MOTION FOR EXTENSION OF TIME TO COMPLY WITH COURTS ORDER
AT DOCKET 651**

TO THE HONORABLE COURT:

COME NOW, Plaintiff, the United States of America, and Defendants, the Commonwealth of Puerto Rico and the Puerto Rico Police Bureau (collectively, the Parties), through the undersigned counsel, and respectfully allege and pray as follows:

1. On November 30, 2017, counsel for PRPB Colonel Clementina Vega, who is not a party to this case, filed a motion requesting an Order to show cause against the PRPB and Secretary Hector Pesquera. (See Docket Nos. 648)

2. On that same date, November 30, this Honorable Court denied Col. Vega's Motion at docket 648. (See Docket No. 649).

3. Also, on that same date, November 30, Col. Vega sought reconsideration of the Court's Order at docket 649. (See Docket No. 650)

4. Likewise, on that same date, November 30, this Honorable Court reaffirmed its decision at docket 649 and stated that it would consider information in Col. Vega's

motion at docket 648, based on compliance concerns raised by the United States and the Technical Compliance Advisor at a previous status conference. This Honorable Court ordered the Parties to submit restricted simultaneous memoranda on the information in Col. Vega's motion at docket 648. This Honorable Court also encouraged the parties to meet before the deadline and come to an agreement or stipulation and proceed to file a joint informative motion to that effect, also in restricted mode. (See Docket No. 651).

5. In order to comply with this Honorable Court's Order at Docket 651, the Parties have been working on a joint stipulation that would address relevant compliance issues raised in Col. Vega's motion at docket 648. The Parties are reviewing and exchanging drafts of the stipulation, and need additional time to complete their good-faith negotiations.

6. Moreover, Defendants need more time to seek approval of the chain of command, including the Governor's Personal Representative who has not had the opportunity to review the latest draft provided by the United States today at 5:05pm for the Defendants' review and comment.

7. Therefore, taking into account the Court's Order to have the GPR sign all pleadings (Doc. 644, 653) and the benefits of having the Parties agree on a stipulation, the Parties respectfully request a short, three-day extension, or until December 11, 2017 to complete negotiations on a joint stipulation or file separate briefs.

WHEREFORE, the Parties respectfully request that this Honorable Court take notice of the above stated and grant this motion for an extension of time, until December 11, 2017, to file a joint stipulation or file separate briefs.

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to all attorneys of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on December 7, 2017.

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